

EXHIBIT 19

Excerpts of July 19, 2018 Deposition of Mary Methvin as Experian's 30(b)(6) witness, Cardinali v. Experian, No. 16-cv-2046-JAD-NJK (D. Nev.), as filed in Leoni, ECF Dkt. 109-2 (D. Nev. Nov. 29, 2018)

EXHIBIT 31

Deposition Transcript of 30(B)(6) Witness Mary Ames Methvin

Dated July 19, 2018

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LOUIS A. CARDINALI,)
Plaintiff,)
v.) Case No. 2:16-cv-2046-JAD-NJK
PLUSFOUR, INC.; RC)
WILLEY HOME)
FURNISHINGS; WEBBANK/)
DELL FINANCIAL)
SERVICES; EQUIFAX)
INFORMATION SERVICES,)
LLC; and EXPERIAN)
INFORMATION SOLUTIONS,)
INC.,)
Defendant.)

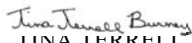
ORAL DEPOSITION OF EXPERIAN INFORMATION
SOLUTIONS, INC. BY AND THROUGH
ITS DESIGNATED 30(B)(6) REPRESENTATIVE
MARY AMES METHVIN
JULY 19, 2018

(PORTIONS OF THIS TRANSCRIPT CONTAIN CONFIDENTIAL
INFORMATION PURSUANT TO A PROTECTIVE ORDER ISSUED IN
THIS CASE AND ARE FOR ATTORNEYS' EYES ONLY. PLEASE
CONSULT COUNSEL PRIOR TO REVIEW.)

ORAL DEPOSITION OF MARY AMES METHVIN, produced
as a witness at the instance of the PLAINTIFF, and duly
sworn, was taken in the above-styled and numbered cause
on the 19th day of July, 2018, from 9:04 a.m. to 5:27
p.m., before TINA TERRELL BURNEY, CSR in and for the

1 State of Texas, reported by machine shorthand, at the	1 INDEX
2 offices of Jones Day, 2727 North Harwood, Suite 500,	2 PAGE
3 Dallas, Texas 75201, pursuant to the Federal Rules of	3 Appearances..... 3
4 Civil Procedure.	4 WITNESS: MARY AMES METHVIN
5	5 Examination by Mr. Clark..... 7
6	6 Examination by Mr. Hall..... 283
7	7 Further Examination by Mr. Clark..... 296
8	8 Signature and Changes..... 298
9	9 Reporter's Certificate..... 300
10	10
11	11
12	12 EXHIBITS
13	13 DESCRIPTION PAGE
14	14 Exhibit 1 Plaintiff's Fourth Amended Notice
15	Bates 30B6 Depo 000001-000031..... 13
16	15 Exhibit 2 Disclosure Logs..... 34
17	16 Exhibit 3 Deposition of Ms. Methvin 8/10/16
18	17 Bates 30B6 Depo 000874-000912..... 82
19	18 Exhibit 4 Letter from Mr. Cardinali to
20	Experian 10/6/15
21	19 Bates 30B6 Depo 000032-000067..... 121
22	20 Exhibit 5 EPC Sorter Manual
23	Bates 30B6 Depo 000532-000590..... 136
24	21 Exhibit 6 First Amended Complaint
25	22 Bates 30B6 Depo 000917-000938..... 157
	23 Exhibit 7 Credit Profile From Experian
	Bates 30B6 Depo 000596-000616..... 195
	24 Exhibit 8 Dispute: Trades
	25 Bates 30B6 Depo 000131-000320..... 211
Page 2	Page 4
1 APPEARANCES	1 EXHIBITS (cont'd)
2 FOR THE PLAINTIFF:	2 DESCRIPTION PAGE
3 Mr. Miles N. Clark	3 Exhibit 9 ACDV Procedures
KNEPPER & CLARK LLC	Bates 30B6 Depo 000394-000531..... 229
4 10040 W. Cheyenne Avenue, Suite 170-109	4 Exhibit 10 e-OSCAR Disputes and Updates
Las Vegas, Nevada 89129	5 Bates 30B6 Depo 000321-000387..... 239
5 710.825.6060 Fax 702.447.8048	6 Exhibit 11 G, H, I and J Updates for
miles.clark@knepperclark.com	Mr. Cardinali
6 Mr. Mohammed Omar Badwan	7 Bates 30B6 Depo 000811-000812..... 248
SULAIMAN LAW GROUP, LTD.	8 Exhibit 12 Experian's Third Amended Objections
2500 S. Highland Avenue, Suite 200	and Responses to Plaintiff's First
8 Lombard, Illinois 60148	Set of Interrogatories
630.575.8180 Fax 630.575.8181	9 Bates 30B6 Depo 000758-000763..... 250
mbadwan@sulaimanlaw.com	10 Exhibit 13 Experian's Amended Objections and
10 Mr. Matthew C. De Re (APPEARING BY TELEPHONE)	Responses to First Set of Requests
ZIMMERMAN LAW OFFICES, P.C.	for Admissions
11 77 West Washington Street, Suite 1220	12 Bates 30B6 Depo 000764-000787..... 258
Chicago, Illinois 60602	13 Exhibit 14 Experian's Answers to Second Set of
312.440.0020 Fax 312.440.4180	Requests for Production
matt@attorneyzim.com	14 Bates 30B6 Depo 000788-000810..... 269
13 FOR THE DEFENDANTS:	15 Exhibit 15 2015 Credit Reporting Resource
14 Mr. Christopher A. Hall	Guide
JONES DAY	16 Bates 30B6 Depo 000388-000393..... 273
16 77 W. Wacker Avenue	17
Chicago, Illinois 60601	18
17 312.782.3939 Fax 312.782.8585	19
chall@jonesday.com	20
18	21
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Page 3	Page 5

<p>1 Q. And by the time that -- when Experian says 2 under "Results," "We have completed the process of your 3 dispute," does that indicate that Mr. Cardinali's 4 reinvestigation is complete aside from the transmission 5 of the results? 02:11PM</p> <p>6 A. Yes, sir.</p> <p>7 Q. Let's look at the middle column.</p> <p>8 A. Okay.</p> <p>9 Q. I want to direct you there. There are a few 10 dashes with some paragraphs set off there. I want to 02:11PM 11 direct your attention to the third dash which begins, 12 "Requests that we send these results." Do you see where 13 I'm looking?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Now, as I read that, it says this is something 02:11PM 16 that the consumer can request to have done, to have 17 their results sent to organizations that are 18 specifically designated?</p> <p>19 A. Yes.</p> <p>20 Q. And as used in this sentence, what does these 02:11PM 21 results mean?</p> <p>22 A. It means the results that these items were -- 23 the results of these specific accounts or these results 24 for this dispute.</p> <p>25 Q. So by these results, do you mean Experian's 02:12PM Page 186</p>	<p>1 break?</p> <p>2 MR. HALL: Sure.</p> <p>3 (Recess.)</p> <p>4 Q. All right. Ms. Methvin, just to clarify, 5 would it be -- is it Experian's policy in a circumstance 02:27PM 6 where it receives a dispute that accounts included in 7 bankruptcy where the account was open before the 8 bankruptcy and Experian can verify that the account 9 was -- that the bankruptcy is on file, is it Experian's 10 policy not to send an ACDV to the data furnisher in that 02:28PM 11 circumstance?</p> <p>12 A. Well, it depends on what the consumer's 13 dispute is. If the consumer says something to the 14 effect like, "This was included in my bankruptcy, and 15 you have the open date wrong," or, "This was included in 02:28PM 16 my bankruptcy, and also it was never late."</p> <p>17 So if there are other elements of the 18 trade that need to be verified, then we need to send an 19 ACDV. But if the dispute was simply, "This was in my 20 bankruptcy," and we can update it to show it included in 02:28PM 21 bankruptcy without notifying the data furnisher, we 22 would.</p> <p>23 But like I said, it depends on what the 24 consumer is saying.</p> <p>25 Q. And we would see an indication on Experian's 02:28PM Page 188</p>
<p>1 reinvestigation?</p> <p>2 A. For this case, yes, sir.</p> <p>3 Q. Would that be the entire CDF?</p> <p>4 A. I believe it would be the same type of 5 information that was sent to the consumer. So if an 02:12PM 6 abbreviated CDF was sent to the consumer, then an 7 abbreviated CDF would be sent to whoever they designate. 8 Or if we send a full disclosure, it would be a full 9 disclosure. I'm pretty sure that's how that works.</p> <p>10 Q. And this reinvestigation, is this a full 02:12PM 11 disclosure to Mr. Cardinali?</p> <p>12 A. I believe that it is. Without looking -- I 13 can look at the DR log and tell you. Give me a second.</p> <p>14 Q. I believe that is Exhibit 2.</p> <p>15 A. Yes, it was. 02:13PM</p> <p>16 Q. So the whole CDF and the dispute results would 17 be sent to the person who --</p> <p>18 A. That he would designate, as long as there's 19 someone who reviewed his credit report, I guess, in the 20 last two years for employment purposes or the last six 02:13PM 21 months, or 12 months for certain states.</p> <p>22 Q. For employment purposes, right?</p> <p>23 A. Two years for employment purposes or six 24 months for other purposes, yes, sir.</p> <p>25 MR. CLARK: Do you guys want to take a 02:14PM Page 187</p>	<p>1 choice on whether to send an ACDV or a DRN on the DR 2 log, right?</p> <p>3 A. Yes, sir. You can see what the agent did by 4 looking in the DR log.</p> <p>5 Q. We were talking before about the 02:29PM 6 reinvestigation document and the potential that that 7 document could be sent to people of Mr. Cardinali's 8 choosing, correct?</p> <p>9 A. Well, anybody that people -- entities of his 10 choosing that had looked at his credit report, yes, sir. 02:29PM</p> <p>11 Q. So this information on the CDF could be sent 12 to a third party?</p> <p>13 A. If he asked us to, yes, sir.</p> <p>14 Q. You can set that aside -- or actually I spoke 15 too soon. I'm sorry. 02:30PM</p> <p>16 Should a consumer's correspondence be 17 attached to the DRN?</p> <p>18 MR. HALL: Objection, form.</p> <p>19 A. Well, if the information that's in the 20 correspondence is used to make the internal change. So, 02:30PM 21 for example, if the consumer gave us a copy of a 22 canceled check and we used that to make the update, then 23 we would attach the correspondence to the DRN.</p> <p>24 Q. In this case, did Experian use Mr. Cardinali's 25 correspondence to determine what type of dispute 02:31PM Page 189</p>

<p>1 I declare under penalty of perjury</p> <p>2 under the laws that the foregoing is</p> <p>3 true and correct.</p> <p>4</p> <p>5 Executed on _____, 20____,</p> <p>6 at _____.</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11 _____</p> <p>12 MARY AMES METHVIN</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 298</p>	<p>1 the witness;</p> <p>2 I further certify that pursuant to FRCP Rule</p> <p>3 30(f)(1) that the signature of the deponent:</p> <p>4 _XXX_____ was requested by the deponent or a</p> <p>5 party before the completion of the deposition and is to</p> <p>6 be returned within 30 days from date of receipt of the</p> <p>7 transcript. If returned, the attached Changes and</p> <p>8 Signature Page contains any changes and the reasons</p> <p>9 therefor;</p> <p>10 _____ was not requested by the deponent or a</p> <p>11 party before the completion of the deposition.</p> <p>12 I further certify that I am neither attorney</p> <p>13 or counsel for, nor related to or employed by, any of</p> <p>14 the parties or attorneys to the action in which this</p> <p>15 deposition was taken. Further, I am not a relative or</p> <p>16 employee of any attorney of record in this case, nor am</p> <p>17 I financially interested in the outcome of the action.</p> <p>18 Subscribed and sworn to on this the 28th</p> <p>19 day of July, 2018.</p> <p>20</p> <p>21</p> <p>22</p> <p>23  TINA TERRELL BURNEY, CSR No. 2908</p> <p>24 Certified Shorthand Reporter</p> <p>in and for the State of Texas</p> <p>25 Certification expires 12/31/18</p> <p style="text-align: right;">Page 300</p>
<p>1 UNITED STATES DISTRICT COURT</p> <p>2 DISTRICT OF NEVADA</p> <p>3 LOUIS A. CARDINALI, §</p> <p>Plaintiff, §</p> <p>§</p> <p>4 v. § Case No. 2:16-cv-2046-JAD-NJK</p> <p>§</p> <p>5 PLUSFOUR, INC.; RC §</p> <p>WILLEY HOME §</p> <p>6 FURNISHINGS; WEBBANK/ §</p> <p>DELL FINANCIAL §</p> <p>7 SERVICES; EQUIFAX §</p> <p>INFORMATION SERVICES, §</p> <p>8 LLC; and EXPERIAN §</p> <p>INFORMATION SOLUTIONS, §</p> <p>9 INC., §</p> <p>Defendant. §</p> <p>10</p> <p>11</p> <p>12 REPORTER'S CERTIFICATION</p> <p>13 TO ORAL DEPOSITION OF</p> <p>14 EXPERIAN INFORMATION SOLUTIONS, INC.</p> <p>15 BY AND THROUGH ITS DESIGNATED 30(B)(6)</p> <p>16 REPRESENTATIVE MARY AMES METHVIN</p> <p>17 JULY 19, 2018</p> <p>18</p> <p>19</p> <p>20 I, Tina Terrell Burney, Certified Shorthand</p> <p>21 Reporter in and for the State of Texas, hereby certify</p> <p>22 to the following:</p> <p>23 That the witness, MARY AMES METHVIN, was duly</p> <p>24 sworn by the officer and that the transcript of the oral</p> <p>25 deposition is a true record of the testimony given by</p> <p style="text-align: right;">Page 299</p>	